

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: MICHELE RAE ROUSE**

**CASE NO. 1-20-03497-HWV**

**Debtor(s)**

**CHAPTER 13**

**FORD MOTOR CREDIT COMPANY, LLC**

**Movant**

**MICHELE RAE ROUSE**

**Respondent**

**DEBTOR'S ANSWER TO AMENDED MOTION OF FORD  
MOTOR CREDIT COMPANY, LLC FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Proof of insurance was provided to Movant's counsel on June 3, 2021.
6. Denied. Debtor has provided adequate protection.
7. Admitted.
8. Denied. There is equity in the vehicle.
9. Denied. After the Motion was filed Debtor paid all past due payments.
10. Denied. Debtor has paid the arrears claimed.

**WHEREFORE**, Debtor prays this Honorable Court denies the Relief from Stay of Ford Motor Credit Company, LLC.

Respectfully submitted,

/s/ Larry W. Wolf, Esq.  
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